

Exhibit A
to the Demitrack Declaration

Waks, Allison L.

From: Hutchinson, Daniel M. <dhutchinson@lchb.com>
Sent: Thursday, March 22, 2018 2:48 PM
To: Demitrack, Thomas; Waks, Allison L.
Cc: 'W. Craft Hughes'; 'Jarrett Ellzey'; 'hturner@tloffices.com'; 'awallace@tloffices.com'; 'Douglas M. Werman'; 'Aaron Siri'; 'Mason Barney'; Selbin, Jonathan D.
Subject: Buchanan v. Sirius XM Radio, Inc.

Good morning Tom.

Following our meeting yesterday, Plaintiff's counsel have reviewed our records and reiterate our request to extend the current class certification deadlines.

Based on the parties' correspondence, Plaintiff's counsel reasonably believed that Sirius XM considered entry of an agreed-upon protective order to be a condition precedent to certain document production. Because the parties did not agree upon a protective order until yesterday's in-person meeting, Sirius XM did not produce records relevant to class certification, including OEM agreements, certain vendor agreements, and data reflecting the landline numbers called by or on behalf of Sirius XM.

Because those records were not produced, Plaintiff also has not yet taken a Rule 30(b)(6) deposition. Just a few days ago, Sirius amended its initial disclosures to identify 26 additional persons. Plaintiff is considering whether testimony from any of these witnesses would be relevant to class certification.

Under these circumstances, we believe that a strong basis exists for a brief extension of the current deadlines. Such an extension will benefit all parties and the Court by allowing efficient briefing based on a complete record. Please confirm whether or not Sirius XM will oppose Plaintiff's request.

Best regards,
Daniel

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